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February 6, 2020

VIA ECF

Hon. Valerie Caproni, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1310
New York, NY 10007

MEMO ENDORSED

Re: *Villegas v. Lex 1751 Inc., et al.*
Case No.: 1:19-cv-06782 (VEC)

Dear Judge Caproni,

We represent Defendants Lex 1751, Fortune One, Inc., AAA Laundry Services, Inc., Kleener King Group Inc. (together, “Corporate Defendants”) and the individual defendant Imran Farooq (together, “Defendants”) in the above-referenced matter. In accordance with Your Honor’s Individual Rules, ¶ 2(C), please accept this letter as Defendants’ request (1) to adjourn the appearance scheduled for February 7, 2020 at 10:00 a.m. and (2) to extend Defendants’ time to Answer the Complaint to March 6, 2020.

Defendants have been ordered to show cause on February 7, 2020 why a default judgement should not be entered against them (See ECF Dkt. 57). Defendants just retained counsel late yesterday evening and Defendants’ counsel filed Notices of Appearances just this morning (See ECF Dkt. 62-64). Defendants are now aware that default proceedings have been initiated against them and that the Court ordered Defendants to file an opposition to the Proposed Default Judgment by January 31, 2020 (ECK Dkt. 57), which has since passed. Should Your Honor adjourn tomorrow’s hearing, Defendants intend to defend Plaintiff’s claims and to participate in the instant litigation in good faith moving forward.

The Corporate Defendants’ original time to Answer was September 19, 2019 (ECF Dkt. 21-24) and individual Defendant Imran Farooq’s original time to Answer was October 23, 2019 (ECF Dkt. 27).

Plaintiff’s counsel does not consent to the relief requested herein.

This request will not affect the litigation otherwise as there are no other scheduled deadlines. No prior request for an adjournment or extension has been made by Defendants.



Hon. Valerie Caproni, U.S.D.J.
January 24, 2020
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We thank the Court for its attention to this matter.

Respectfully yours,

ELLENOFF GROSSMAN & SCHOLE LLP

A handwritten signature in blue ink that reads "Nicole Vescova".

Nicole Vescova

cc: All counsel of Record (via ECF)

Defense counsel must appear at the hearing as scheduled, and the parties must be prepared to enter a case management plan, in the event that the Court vacates Defendants' default.

SO ORDERED.

Date: 02/06/2020

A handwritten signature in blue ink that reads "Valerie Caproni".

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE